

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 05-CV-10879-JLT

KIMBERLY GENEREUX,)
Plaintiff)
v.)
COLUMBIA SUSSEX CORPORATION,) **PLAINTIFF'S MOTION IN LIMINE**
STARWOOD HOTELS & RESORTS) **TO REDACT CONVERSATIONS**
WORLDWIDE, INC., and) **RELATING TO LITIGATION FROM**
WESTIN HOTEL MANAGEMENT, L.P.,) **PSYCHOTHERAPY RECORDS**
Defendants)

Kimberly Genereux, the plaintiff, hereby moves this Court *in limine* to allow her counsel to redact her psychotherapy records to eliminate references to conversations relating to the instant litigation.

In support of her Motion, the plaintiff states the following:

1. The references are irrelevant to the plaintiff's medical condition resulting from the rape.
2. The references are irrelevant to the issue of liability.
3. The references demonstrate the plaintiff's concerns about the difficulty of holding the defendants liable for incidents which occurred in the Cayman Islands, occasionally relate information learned from counsel, reflect the distress that she has experienced as a result of the litigation, and would be highly prejudicial to the plaintiff's claim.

The plaintiff will file copies of the pages she seeks to

redact with the portions to be redacted highlighted for the convenience of the Court.

The Plaintiff,
By her Attorney,

MARK F. ITZKOWITZ (BBO #248130)
85 Devonshire Street
Suite 1000
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April 8, 2008

CERTIFICATE OF SERVICE

I, Mark F. Itzkowitz, counsel for the plaintiff, hereby certify that on this date, I made service of the within document by serving it electronically to registered ECF participants and/or by mailing/faxing/hand-delivering a copy of same to non-registered ECF participants as indicated on the Notice of Electronic Filing ("NEF"), upon the following counsel of record:

John B. Johnson, Esquire
Corrigan, Johnson & Tutor, P.A.
141 Tremont Street
Boston, MA 02111; and

Robert J. Brown, Esquire
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New York, NY 10019-6829.

s/ Mark F. Itzkowitz
MARK F. ITZKOWITZ (BBO #248130)

Dated: April 8, 2008